

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors. ¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**MOTION TO INFORM AMERINATIONAL COMMUNITY SERVICES, LLC'S
APPEARANCE AT THE HEARING ON CONFIRMATION OF HTA PLAN OF
ADJUSTMENT AND AUGUST 17-18, 2022 OMNIBUS HEARING**

COMES NOW AmeriNational Community Services, LLC (hereafter "AmeriNat") as servicer for the GDB Debt Recovery Authority (the "DRA") authorized to pursue and enforce the DRA's rights and remedies in any legal proceeding, including the DRA's participation as a creditor in the instant Title III case, by and through the undersigned legal counsel, and respectfully submits this motion in compliance with the Court's *Order Regarding Procedures For Hearing on Confirmation of HTA Plan of Adjustment and August 17-18, 2022, Omnibus Hearing* (Dkt. No.² 21068) (the "Scheduling Order")³:

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Building Authority ("PBA") (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² "Dkt. No." refers to documents filed in Case No. 17-03283 (LTS) unless otherwise noted.

³ Capitalized terms used herein and otherwise not defined shall have the meaning ascribed to such term in the Scheduling Order.

1. Attorney Alejandro J. Cepeda-Díaz and/or Arturo J. García-Solá and/or Nayuan Zouairabani of McConnell Valdés, LLC will appear on behalf of AmeriNat at the Hearings which will be conducted in Courtroom 3 of the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767 (the “San Juan Courtroom”).

2. Mr. Cepeda-Díaz and/or Mr. García-Solá and/or Mr. Zouairabani will attend the Hearings in person in the San Juan Courtroom.

3. The email address of Mr. Cepeda-Díaz is ajc@mcvpr.com, the email address of Mr. García-Solá is ajg@mcvpr.com, and the email address of Mr. Zouairabani is nzt@mcvpr.com. Further, Mr. Cepeda-Díaz, Mr. García-Solá, and Mr. Zouairabani hereby submit their Party Appearance Cover Sheet as **Exhibit A** to this motion.

4. AmeriNat reserves the right to be heard and present oral argument on any matter identified in the agenda to be filed by the Oversight Board in connection with the Hearings, or to address any statement or issue that may be raised by any party at the Hearings related to the Title III cases or adversary proceedings which may affect the interests of the DRA. AmeriNat also reserves the right to amend this motion as needed.

WHEREFORE, AmeriNat respectfully requests the Court to take note of the foregoing and deem it in compliance with the Scheduling Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 18th day of July, 2022.

CERTIFICATE OF SERVICE: In accordance with Fed. R. Bankr. P. 9014(b), Fed. R. Bankr. P. 7004(b), and the Court’s *Sixteenth Amended Notice, Case Management and Administrative Procedures Order* (Dkt. No. 20190-1) (the “CMP Order”), we hereby certify that

a true and exact copy of the foregoing was sent by electronic mail upon all the parties listed in the Master Service List and by U.S. mail upon all the Standard Parties listed in the CMP Order.

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MCCONNELL VALDÉS LLC
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By: /s/ Arturo J. García-Solá
Arturo J. García-Solá
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/s/ Alejandro J. Cepeda-Díaz
Alejandro J. Cepeda-Díaz
(USDC No. 222110)
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/s/ Nayuan Zouairabani
Nayuan Zouairabani
(USDC No. 226411)
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EXHIBIT A¹

PARTY APPEARANCE SHEET

Name of Party	AmeriNational Community Services, LLC	Is the party attending the Confirm. Hearing, Omnibus Hearing, <u>or</u> Both? Both
ATTORNEY 1	Appearance Method	In Person – PR <u>or</u> CourtSolutions Speaking Line ² In Person
	Name	Arturo J. García-Solá
	Law Firm	McConnell Valdés, LLC
	Email	ajg@mcvpr.com
	Phone Number	787-250-5632
	Docket Entry No. of Notice of Appearance	18991
ATTORNEY 2	Appearance Method	In Person – PR <u>or</u> CourtSolutions Speaking Line In Person
	Name	Nayuan Zouairabani-Trinidad
	Law Firm	McConnell Valdés, LLC
	Email	nzt@mcvpr.com
	Phone Number	787-250-5619
	Docket Entry No. of Notice of Appearance	4969
ADDITIONAL ATTORNEY OBSERVATION	Complete the below information for each attorney appearing for observation purposes. Name Observation Method <ul style="list-style-type: none"> • CourtSolutions Listen Only • In Person – PR • In Person – NY Law Firm Email Phone Number	Alejandro J. Cepeda-Díaz In Person - PR McConnell Valdés, LLC ajc@mcvpr.com 787-250-5637
Pursuant to the Hearing Procedures Order ¶ 1, in-person participation by counsel will be prioritized in the following manner: the Financial Oversight and Management Board for Puerto Rico and the Puerto Rico Fiscal Agency and Financial Advisory Authority shall each be permitted 4 attorneys present in Courtroom 3 in San Juan, and each other party-in-interest shall be permitted 2 attorneys present in Courtroom 3 in San Juan.		

¹ This Party Appearance Sheet must be attached to a party in interest's Informative Motion as **Exhibit A**.

² Pursuant to the Hearing Procedures Order ¶ 2, attorneys intending to participate by CourtSolutions must also separately register on the CourtSolutions website.

Space permitting, additional attorneys who wish to view but not participate in the Confirmation Hearing or August Omnibus Hearing may gain admittance to the live courtroom (Courtroom 3 in San Juan), or the live feed which will be broadcasted in Courtroom 17C in New York on a first-come first-served basis. All attorneys who wish to observe in person must be listed on this appearance sheet.

EXHIBIT B¹
PARTY WITNESS COVER SHEET

N/A

Name of Party			
Does the Party intend to offer a witness?			
Total Number of Witnesses			
Witness Name	Expert or Fact Witness	Is interpreter required? (Proponent of witness must provide certified interpreter)*	Scope of Testimony

*The Court does not provide interpreters for witness testimony.

¹ This Party Witness Cover Sheet must be attached to a party-in-interest's Informative Motion as **Exhibit B**.

EXHIBIT C¹
PARTY EXHIBIT COVER SHEET

N/A

Name of Party		
Does the Party intend to offer evidence?		
Docket Entry No. for Party Exhibit List		
Exhibit Identifier ²	Docket Entry No. of Exhibit	Is there a pending request to seal this Exhibit?
Pursuant to Bankruptcy Local Rule 9037-1(a), parties and counsel are solely responsible for redacting the personal identifiers enumerated in Fed. R. Bank. P. 9037(a).		

¹ This Party Exhibit Cover Sheet must be attached to a party-in-interest's Informative Motion as **Exhibit C**.

² Each Exhibit should be named in sequential party-identified numbering (e.g., "FOMB Ex. 1" or "UCC Ex. A").